Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Commission's Secretary
Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, DC 20554

Annual 64.2009(e) CPNI Certification for 2007.

Date filed: 2-28-08

Name of company covered by this certification: Grafton Telephone Company

Form 499 Filer ID: 801363

Name of signatory: Carolyn Susan Arnold Title of signatory: Corporate Secretary

I, Carolyn Susan Arnold, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

/s/ Carolyn Susan Arnold Corporate Secretary

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cc: (2) Federal Communications Commission, Enforcement Bureau; (1) Best Copy and Printing, Inc.